

Cohen, Dippell and Everist, P.C.

Before The  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

|  |   |                      |
|--|---|----------------------|
| In the Matter of                           | ) |                      |
|  | ) |                      |
| Office of Engineering and Technology       | ) | ET Docket No. 14-14  |
| Seeks To Supplement The Incentive Auction) | ) | GN Docket No. 12-268 |
| Proceeding Record Regarding Potential      | ) |                      |
| Interference Between Broadcast Television  | ) |                      |
| and Wireless Services                      | ) |                      |

Comments  
on Behalf of  
**COHEN, DIPPELL AND EVERIST, P.C.**

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Public Notice released by the Commission on January 29, 2014. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 70 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communications industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

These comments address the item under the heading, "Technical Assumptions."<sup>1</sup> In the first paragraph, it states the following:

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<sup>1</sup>FCC Public Notice entitled, "Office of Engineering and Technology Seek to Supplement the Incentive Auction Proceeding Record Regarding Potential Interference Between Broadcast Television and Wireless Services"

“The OET methodology makes certain assumptions about the characteristics of DTV transmission facilities and DTV receivers as well as wireless transmission facilities and receivers based mostly on existing industry standards and available technical data.”

A significant question arises with the fast-moving technical innovation in the wireless area; how can one be confident of the current technical criteria and that this technical wireless criteria will be further developed and thereby change in the next 5 years or 10 years? The broadcast industry (transmission and the typical over-the-air viewers) will be harmed if these technical assumptions in which there is considerable doubt are assumed to be valid.

For example, that paragraph under “Technical Assumptions” also states as follows:

“Receiver performance expectations were used to develop the interference criteria in the Commission Rules (Footnote 7). Footnote 7 states, “See OET-69, Table 5A”

As evidenced by industry publications<sup>2</sup> and the presentation at AFCCE<sup>3</sup>, it is quite evident that for this endeavor these technical assumptions receiver performance are not valid for this stated purpose.

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<sup>2</sup>TV Technology, November 20, 2013 and December 18, 2013

<sup>3</sup>AFCCE Mini-Symposium, October 25, 2013

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Comments

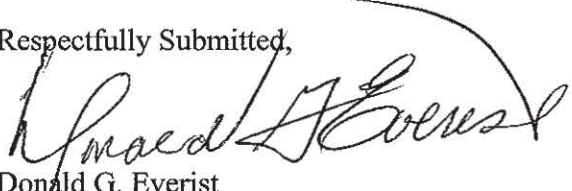
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Therefore, if the FCC proceeds in this effort of "offering varying amounts of spectrum in different geographic locations, depending on the spectrum recovered," the record will be incomplete and thereby raises the potential of interference to existing off-the-air households.

Therefore, the FCC is urged to reconsider its assumptions as outlined in the Public Notice dated January 29, 2014 (DA 14-98).

Respectfully Submitted,



Donald G. Everist

Date: March 18, 2014